

Arent Fox

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June 27, 2007

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VIA CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428 Attn: Section 8(e)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001
Phone: (202)564-8940

MR # 305665

Company Sanitized

Re: TSCA Section 8(e) Report

Dear Sir or Madam:

This firm represents Tween Brands, Inc. ("Tween Brands" or the "Company"), a company that markets apparel and accessories, including jewelry, to the 7-14 year age group. I am writing, as counsel to the Company, to make this report pursuant to the provisions of TSCA Section 8(e), which may not apply to this situation. Given the information-gathering nature of TSCA reporting, however, the Company decided it would share this information with the EPA in the hopes that this report may be useful to the Agency.

Just prior to the product recall being voluntarily conducted by Tween Brands in cooperation with the U.S. Consumer Product Safety Commission (CPSC) of certain children's jewelry imported from China, CPSC Recall Number RP 070320, Tween Brands became aware that the recalled jewelry products it sold may have contained lead. We are informed that the Chemical Abstract Service Registry Number for lead is 7439-92-1. The suspect products were sold by Tween Brands between September 2005 and May 2007, and were obtained from the following vendors: **[CONFIDENTIAL INFORMATION REDACTED]**. As part of their contractual obligations to Tween Brands, all of these vendors represented and warranted to Tween Brands (before the Company made any purchases or accepted the imported jewelry from these vendors) that the products they were selling and delivering to Tween Brands met all EPA and CPSC guidelines with respect to health and safety, among other matters.



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[CONFIDENTIAL INFORMATION REDACTED]

We trust that this information satisfies EPA's interest in this matter.

Please feel free to contact me with any questions or comments about this report.

Sincerely,

A handwritten signature in cursive script, reading "Deanne Ottaviano". The signature is written in black ink and is positioned above the printed name.

Deanne M. Ottaviano